

**UNITED STATES BANKRUPTCY COURT  
FOR THE EASTERN DISTRICT OF PENNSYLVANIA**

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**In re:**

**ISLAND VIEW CROSSING II, L.P.,**

**Debtor.**

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**KEVIN O'HALLORAN, in his capacity  
as Chapter 11 Trustee for ISLAND  
VIEW CROSSING II, L.P.,**

**Plaintiff,**

**vs.**

**PRUDENTIAL SAVINGS BANK,**

**Defendant.**

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:  
: **CHAPTER 11**  
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: **BANKRUPTCY NO. 17-14454 (ELF)**  
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:  
: **ADVERSARY NO. 17-00202 (ELF)**  
: **ADVERSARY NO. 18-00280 (ELF)**  
: **(Consolidated)**  
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**DEFENDANT, PRUDENTIAL SAVINGS BANK'S PRE-TRIAL DISCLOSURES**  
**PURSUANT TO F.R.C.P. 26(a)(3)**

**(A). Witnesses**

1. Ron Gualtieri
2. Bernie Sauer
3. Judy Schmitt
4. Walt Zoladz
5. Kip Hamilton  
c/o Nicholas Poduslenko, Esquire
6. Joel Murovitz  
c/o Nicholas Poduslenko, Esquire
7. Joseph Baran  
c/o Bohler Engineering  
1600 Manor Drive, Suite 200  
Chalfont, PA 18914

8. Craig Smith  
c/o Landmark Science & Engineering  
100 Commons Boulevard, Suite 301  
Newcastle, DE 19720
9. Alex Nadalini
10. Nancy Maychuk
11. David Nasatir, Esquire  
c/o Obermayer Rebmann Maxwell & Hippel LLP  
1500 Market Street, Suite 3400 West  
Philadelphia, PA 19103
12. Kevin O'Halloran, Trustee
13. Ralph Brotherton  
c/o Trustee
14. Anthony Migliorino  
c/o Prudential Savings Bank
15. Dennis Pollack  
c/o Prudential Savings Bank
16. Nick DiGianivittorio  
c/o Prudential Savings Bank
17. Gary Rielly  
c/o Prudential Savings Bank
18. James Klementisz, Jr.
19. Thomas Petrecz, and/or Designee of  
Penn E&R  
2755 Bergey Road  
Hatfield, PA 19440
20. Kurt Schroder c/o  
Gilmore & Associates, Inc.  
65 E. Butler Avenue, Suite 100  
New Britain, PA 18901
21. Glen Holinka and/or Designee of  
Ebert Engineering  
4092 Skippack Pike

Skippack, PA 19474

22. Gilmore & Associates, Inc. Designee  
65 E. Butler Avenue, Suite 100  
New Britain, PA 18901
23. Joseph Hannon
24. Joe Donato
25. Gregg Adelman, Esquire  
Kaplin Stewart  
910 Harvest Drive, Suite 200  
Blue Bell, PA, 19422
26. Kevin McGrath and/or Designee of  
c/o McGrath Homes
27. Premium Excavating Designee  
269 Canal Road  
Fairless Hills, PA 19030
28. BKRE Investments, LLC, Designee
29. Greg Harris c/o Asterion Consultants  
1617 JFK Boulevard, Suite 1040  
Philadelphia, PA 19103
30. William Sasso, Esquire  
c/o Stradley Ronon Stevens & Young  
2005 Market St., #2600  
Philadelphia, PA 19103
30. Michael Cordone, Esquire  
c/o Stradley Ronon Stevens & Young  
2005 Market St., #2600  
Philadelphia, PA 19103
31. Joseph Ferry, Esquire
32. Commonwealth Capital Designee
33. Kevin O'Halloran, Trustee Designees
34. Aris Karalis Esq.
35. Joseph Baran and/or Designee of

Bohler Engineering

36. Kramer Insurance Designee

37. Timothy P. Golden, Jr., MAI

38. CBRE – Valuation and Advisory Services

**(B). Designation of Witnesses Whose Testimony is Expected to be Presented by Me at the Deposition**

1. Prudential Savings Bank intends to introduce the deposition testimony of Ronald Gualtieri taken on the following dates:
  - a. February 25, 2020 (the designation of the pertinent parts of the February 25 deposition is attached hereto as Exhibit “A” and incorporated herein);
  - b. February 26, 2020 (the designation of the pertinent parts of the February 26 deposition is attached hereto as Exhibit “B” and incorporated herein); and
  - c. March 11, 2020 (the designation of the pertinent parts of the March 11 deposition is attached hereto as Exhibit “C” and incorporated herein);.
2. Prudential Savings Bank intends to introduce selected testimony from the Bankruptcy Hearings taken on:
  - a. October 16, 2017 (the designation of the pertinent parts of the transcript of the October 16 hearing is attached hereto as Exhibit “D” and incorporated herein);
  - b. October 19, 2017 (the designation of the pertinent parts of the transcript of the October 19 hearing is attached hereto as Exhibit “E” and incorporated herein);
  - c. November 13, 2017 (the designation of the pertinent parts of the transcript of the November 13 hearing is attached hereto as Exhibit “F” and incorporated herein);
  - d. November 16, 2017 (the designation of the pertinent parts of the transcript of the November 16 hearing is attached hereto as Exhibit “G” and incorporated herein);
  - e. November 17, 2017 (the designation of the pertinent parts of the transcript of the November 17 hearing is attached hereto as Exhibit “H” and incorporated herein);

**(C). Identification of Exhibits**

<b><u>Exhibit</u></b>	<b><u>Description</u></b>
D1	9/20/11 collateral mortgage
D2	7/14/11 Gualtieri letter
D3	3/1/13 relationship credit review
D4	1/27/11 Gualtieri letter
D5	Gualtieri Global Property Analysis
D6	4/10/14 Nick DiGianivittorio email to S. Fratanduono
D7	Gualtieri 6/30/12 personal financial statement
D8	Gualtieri 5/1/12 letter

D9 8/24/12 Bohler Engineering letter to Gualtieri  
D10 AmeriCorp Homes Development Financial Analysis dated 9/11/12  
D11 AmeriCorp Homes Development Financial Analysis dated 4/18/13  
D12 5/23/13 Gualtieri letter to Ernie Stefkovic  
D13 5/16/13 Gualtieri letter to RDA  
D14 7/28/13 Gualtieri letter to Dave Krauter  
D15 9/20/13 IVC loan agreement  
D16 8/16/13 Gualtieri email to Bryan and Ann Hartig  
D17 8/29/13 Gualtieri email to S. Frantanduono  
D18 9/20/13 IVC settlement sheet  
D19 10/3/13 Orens Brothers letter to Gualtieri  
D20 4/11/14 A. Nadalini email to S. Fratanduono  
D21 7/3/14 S. Fratanduono email to Gualtieri  
D22 6/10/14 Gualtieri email to S. Fratanduono  
D23 8/4/14 J. Donato email to Gualtieri  
D24 5/27/14 S. Fratanduono email to Gualtieri  
D25 12/5/13 Gualtieri email to Prudential Savings Bank  
D26 1/8/16 J. Schmitt email to Gualtieri  
D27 4/7/15 Gualtieri email to Bohler Engineering  
D28 12/9/14 J. Schmitt email to S. Fratanduono  
D29 12/30/14 Gualtieri email to J. Schmitt  
D30 4/8/15 J. Sohinski email to Gualtieri  
D31 6/3/15 Gualtieri email to Craig Smith  
D32 8/18/14 Gualtieri email to J. Schmitt  
D33 6/29/15 Landmark Science & Engineering email to Gualtieri  
D34 6/30/15 Gualtieri email to Landmark Engineering  
D35 11/30/15 Landmark Science & Engineering letter to Gualtieri  
D36 IVC ledger  
D37 3/26/15 Gualtieri letter to S. Frantanduono  
D38 12/26/14 Construction loan agreement  
D39 10/15/14 J. Schmitt email to S. Frantanduono  
D40 4/24/15 Eckert Seamans reconciliation  
D41 8/6/15 Expo Construction email to J. Schmitt  
D42 8/13/15 IVC draw request  
D43 1/16/16 IVC draw request  
D44 2/15/16 IVC draw request  
D45 McElderry Complaint versus AmeriCorp Homes.  
D46 1/25/16 M. Cordone email to Prudential Savings Bank  
D47 1/27/16 IVC draw request  
D48 4/25/16 M. Cordone email to Prudential Savings Bank  
D49 2/10/16 M. Cordone email to Prudential Savings Bank  
D50 Antolino Masonry claim of lien  
D51 IVC bankruptcy schedules  
D52 One State Street bankruptcy schedules  
D53 US Plumbing invoices and ledger  
D54 1/27/16 IVC draw request  
D55 9/23/15 IVC draw request

D56 11/20/15 IVC draw request  
D57 7/24/13 Gualtieri email to J. Schmitt  
D58 Republic First Bank Complaint versus Fidelity Properties, Inc.  
D59 4/1/15 Gualtieri email to S. Frantanduono  
D60 4/2/15 Gualtieri email to S. Frantanduono  
D61 1/7/16 Gualtieri letter to Prudential Savings Bank  
D62 2/9/09 Gualtieri letter to Prudential Savings Bank  
D63 4/10/09 Gualtieri letter to Prudential Savings Bank  
D64 5/3/10 Gualtieri letter to Caterpillar Financial  
D65 11/5/10 Gualtieri letter to Prudential Savings Bank  
D66 6/21/10 Durham Manor construction loan agreement  
D67 6/21/10 Calnshire collateral mortgage  
D68 9/20/11 Revised and restated development construction loan agreement  
D69 7/21/11 AmeriCorp Homes proposed loan recast  
D70 6/19/12 Gualtieri letter to Prudential Savings Bank  
D71 8/16/12 Gualtieri email to S. Frantanduono  
D72 9/13/12 second addendum to revised and restated development construction loan agreement  
D73 Intentionally omitted  
D74 1/26/16 E. McAllister email to B. Sauer  
D75 7/1/13 B. White email to Gualtieri  
D76 7/30/13 Bohler Engineering email to Gualtieri  
D77 1/5/14 Gualtieri email to Bohler Engineering  
D78 7/28/14 Bohler Engineering email to Gualtieri  
D79 8/11/14 C. Smith email to Gualtieri  
D80 8/21/14 Gilmore & Associates email to Bohler Engineering  
D81 9/9/14 Gilmore & Associates letter to Bristol Borough  
D82 10/2/14 Gualtieri email to Bohler Engineering  
D83 10/31/14 Gualtieri email to Prudential Savings Bank  
D84 11/3/14 Thomas Petrecz email to Bohler Engineering  
D85 5/24/14 IVC endorsement to agreement of sale  
D86 1/5/15 Joel Bolstein email to Gualtieri  
D87 Intentionally omitted  
D88 1/7/15 T. Petrecz email to Gualtieri  
D89 1/9/15 T. Petrecz email to Bohler Engineering  
D90 7/1/13 B. White email to Gualtieri  
D91 1/14/15 R. White email to Gualtieri  
D92 M. Caione Complaint versus IVC  
D93 3/6/15 Gualtieri email to G. Adelman  
D94 3/11/15 Gualtieri email to R. White  
D95 3/25/15 IVC pre-construction meeting  
D96 3/26/15 Gualtieri email to G. Adelman  
D97 5/30/15 Gilmore & Associates email to Gualtieri  
D98 6/8/15 Gilmore & Associates email to Gualtieri  
D99 6/10/15 D. McGuire email to Gualtieri  
D100 6/18/15 Gilmore & Associates email to Gualtieri

D101 6/25/15 Gualtieri email to R. White  
D102 7/2/15 Gualtieri email to G. Adelman  
D103 7/2/15 R. Stoneback email to Gualtieri  
D104 8/3/15 Gilmore & Associates email to G. Adelman  
D105 8/31/15 Gualtieri email to Premium Excavating  
D106 9/23/15 Gualtieri email to Bohler Engineering  
D107 9/28/15 Gualtieri email to Gilmore & Associates  
D108 9/29/15 Gilmore and Associates email to Gualtieri  
D109 10/20/15 Gualtieri letter to Prudential Savings Bank  
D110 10/29/15 Gualtieri email to Bristol Borough  
D111 11/11/15 IVC construction meeting  
D112 3/2/15 G. Adelman email to Ebert Engineering  
D113 2/3/16 B. Sauer email to Gualtieri  
D114 2/3/16 W. Zoladz email  
D115 7/14/16 D. Nasatir email to M. Cordone  
D116 6/14/11 J. Dempsey email K. Hopely (IVC271950)  
D117 7/1/13 IVC appraisal  
D118 3/13/14 Steeple Run appraisal (C\_0001415)  
D119 9/20/13 Prudential loan document (IVC237666)  
D120 4/21/13 Gualtieri email to J. Balka (IVC071109)  
D121 5/31/12 Gualtieri email to Bohler Engineering (IVC111296)  
D122 5/20/13 Gualtieri email to J. Balka (IVC273281)  
D123 6/6/13 R. White letter to Gualtieri (IVC115690)  
D124 6/12/13 Gualtieri email to Orens Brothers (IVC115752)  
D125 9/20/13 Island View loan summary  
D126 9/5/13 D. Kelly email to A. Nadalini (PSB031415)  
D127 11/18/13 Gualtieri email to Prudential Savings Bank (PSB028016)  
D128 2/28/14 Gualtieri email to Prudential Saving Bank (IVC119914)  
D129 6/5/14 Gualtieri email to J. Schmitt (IVC122968)  
D130 5/21/14 M. Costigan letter to Prudential Savings Bank (PSB029293)  
D131 8/21/13 Gualtieri email to Prudential Savings Bank (PSB024841)  
D132 9/11/13 Gualtieri letter to Oren Brothers (IVC116560)  
D133 9/5/13 Gualtiere email to J. Decker (IVC116469)  
D134 4/10/14 N. DiGianivittorio email to S. Frantanduono (PSB058805)  
D135 11/18/13 Gualtieri email to Prudential Savings Bank (PSB028016)  
D136 12/4/13 Gualtieri email to J. Ferry, Esquire (IVC234135)  
D137 2/25/14 Gualtieri email to Prudential Savings Bank (IVC119614)  
D138 3/5/14 Gualtieri letter to G. Ciocca (IVC119961)  
D139 5/23/14 Gualtieri email to PECO Energy (IVC122719)  
D140 8/27/14 Gaultieri email to Prudential Savings Bank (IVC082493)  
D141 9/22/14 CNH Construction Management email to Gualtieri  
(IVC125332)  
D142 10/2/14 Gaultieri email to Prudential Savings Bank (IVC085152)  
D143 10/15/14 Prudential Savings Bank email to Gualtieri (IVC085890)  
D144 10/15/14 Gualtieri email to Prudential Savings Bank (PSB02805)  
D145 12/4/14 J. Schmitt email to Prudential Savings Bank (PSB030064)  
D146 3/25/15 J. Schmitt email to Prudential Savings Bank (IVC084503)

D147 IVC Phase I home site available sheet (IVC334307)  
D148 6/5/14 Gualtieri email to J. Klementisz (IVC320061)  
D149 Calnshire Estates ledger entries (IVC237682)  
D150 1/7/16 Penn E&R, Inc., email to J. Schmitt (IVC080877)  
D151 11/24/15 Republic Bank email to Gualtieri (IVC349991)  
D152 11/24/15 Stark & Stark letter to Gualtieri (IVC349992)  
D153 7/17/15 Snyder Land Services email to J. Schmitt (IVC008557)  
D154 7/30/15 IVC draw request (B\_000014)  
D155 7/31/15 Beneficial Bank statement (B\_008996)  
D156 7/15/15 J. Schmitt email to Prudential Savings Bank (IVC016874)  
D157 Complaint and Confession of Judgment (Republic Bank v. Gualtieri) (B\_001518)  
  
D158 4/25/16 M. Cordone email to Prudential Savings Bank (IVC215404)  
D159 5/23/16 M. Cordone email to D. Nasatir (B\_000414)  
D160 3/14/16 Bucks County Electric email to J. Schmitt (IVC012803)  
D161 12/21/15 McElderry Drywall invoices (B\_0003456)  
D162 AmCorp, IVC, Inc., purchase order (B\_006483)  
D163 5/3/16 M. Antolino email to J. Schmitt (B\_003485)  
D164 1/12/16 M. Maychuk email to J. Schmitt (IVC010179)  
D165 3/8/16 B. Sauer email to J. Schmitt (IVC014520)  
D166 1/14/16 B. Sauer email to J. Schmitt (IVC014473)  
D167 2/2/16 Bucks County Electric email to J. Schmitt (IVC012793)  
D168 2/3/16 Bucks County Electric email to J. Schmitt (IVC012796)  
D169 6/4/15 J. Hannon email to Gualtieri (IVC011171)  
D170 4/16/-- Bristol Borough email to Prudential Savings Bank (PSB064277)  
  
D171 4/28/16 Bristol Borough email to Prudential Savings Bank (PSB058028)  
  
D172 7/12/16 Bristol Borough email to Prudential Savings Bank (PSB058113)  
  
D173 10/10/13 J. Schmitt email to Prudential Savings Bank (PSB025221)  
D174 11/19/13 J. Schmitt email to Prudential Savings Bank (PSB028024)  
D175 12/30/14 J. Schmitt email to Prudential Savings Bank (PSB034126)  
D176 4/2/15 A. Nadalini email to S. Frantanduono (PSB034561)  
D177 7/30/15 IVC draw request  
D178 5/23/14 R. White email to Gualtieri (IVC319898)  
D179 7/25/14 Gualtieri email to Bohler Engineering (IVC274255)  
D180 12/29/14 Gualtieri email to G. Adelman (IVC324259)  
D181 10/17/14 Penn E&R email to Gualtieri (IVC322326)  
D182 10/30/14 Bohler Engineering email to Gualtieri (IVC349561)  
D183 1/25/15 Gualtieri email to R. White (IVC324795)  
D184 2/13/15 T. Petrecz email to Bohler Engineering  
D185 3/25/15 A. Nadalini email to S. Frantanduono (PSB034475)  
D186 3/30/15 Penn E&R soil remediation plan  
D187 4/23/15 Gualtieri email to R. White (IVC327448)  
D188 4/29/15 Bristol Borough email to Gilmore & Associates (IVC132003)  
D189 6/8/15 Gualtieri email to R. White (IVC328716)



D190 6/12/15 Gualtieri email to Gilmore & Associates (IVC134152)  
D191 6/15/15 Gualtieri email to J. Schmitt (IVC328927)  
D192 6/19/15 Earth Engineering email to Gualtieri (IVC329252)  
D193 6/23/15 Earth Engineering email to Gualtieri (IVC329392)  
D194 6/23/15 Landmark Engineering email to Gualtieri (IVC329420)  
D195 7/17/15 Gualtieri email to Prudential Savings Bank (PSB060593)  
D196 11/14/15 J. Schmitt email to Prudential Savings Bank (IVC086779)  
D197 1/12/16 IVC construction meeting minute (IVC064658)  
D198 2/11/16 Gualtieri email to M. Cordone (IVC071976)  
D199 8/19/16 W. Zoladz email to B. Shadler (IVC217037)  
D200 10/12/16 Exelon email to Gualtieri (IVC218535)  
D201 11/22/16 T. Petrecz email to Gualtieri (IVC219220)  
D202 6/21/17 Gualtieri email to M. Cordone (IVC245095)  
D203 6/29/17 Gualtieri email to M. Cordone (IVC245220)  
D204 12/17/18 A. Karalis letter to Pennsylvania Dep. (IVC254279)  
D205 1/30/19 Pennsylvania Dep letter to K. O'Halloran (IVC258221)  
D206 2/6/19 B. Sauer email to R. Brotherton (IVC258430)  
D207 2/13/19 B. Sauer email to G. Kressman (IVC269382)  
D208 2/13/19 Penn E&R letter to B. Sauer (IVC269393)  
D209 2/24/19 K. O'Halloran email to J. Nagele (IVC299324)  
D210 3/19/19 B. Sauer email to G. Kressman  
D211 3/28/19 K. Schroeder email to K. McGrath (IVC262258)  
D212 3/29/19 B. Sauer email to J. Parisi (IVC300642)  
D213 L. Mapleton email to T. Patrecz  
D214 4/9/19 K. O'Halloran email to B. Sauer (IVC301425)  
D215 4/8/19 G. Kressman email to B. Sauer (IVC270986)  
D216 5/6/19 B. Sauer email to G. Kressman  
D217 5/6/19 K. O'Halloran email to B. Sauer (IVC302748)  
D218 5/23/19 B. Sauer email to G. Kressman  
D219 7/1/19 A. Karalis letter to E. George, Esq.  
D220 7/1/19 P. Lamont email to B. Sauer  
D221 7/15/19 G. Kressman email to L. Mapleton  
D222 8/5/19 L. Mapleton email to P. Lamont  
D223 8/13/19 P. Lamont email G. Kressman  
D224 8/21/19 Penn E&R letter to L. Mapleton  
D225 8/22/19 A. Karalis email to E. George  
D226 3/6/15 Gualtieri email to G. Adelman (IVC326258)  
D227 6/25/15 Gualtieri email to R. Wight (IVC329464)  
D228 11/5/15 Gilmore & Associates email to Gualtieri (IVC065620)  
D229 9/28/16 Bristol Borough email to Gualtieri (IVC239052)  
D230 5/23/17 Pennsylvania DOT letter to IVC (IVC345121)  
D231 1/14/15 R. Wight email to Gualtieri (IVC324673)  
D232 6/11/15 Gilmore & Associates letter to Bristol Borough (IVC328860)  
D233 11/19/15 Ebert Engineering email to Gualtieri (IVC277178)  
D234 9/28/16 W. Zoladz email to C. Kachmar (IVC217666)  
D235 2/21/19 C. Kachmar email to M. Ballor (IVC298818)  
D236 2/10/20 IVC Certificate of Completion

D237 5/23/14 Gualtieri email to PECO Energy (IVC122719)  
D238 9/9/15 Comcast Cable email to W. Zoladz (IVC206345)  
D239 9/29/15 J. Hannon email to W. Zoladz (IVC332181)  
D240 11/18/15 Comcast Cable email to B. Sauer (IVC209469)  
D241 1/20/16 PECO letter to Gualtieri (IVC070238)  
D242 2/18/16 PECO Energy email to Gualtieri (IVC070253)  
D243 3/2/16 Gualtieri email to J. Schmitt (IVC072352)  
D244 3/24/16 PECO Energy email to B. Sauer (IVC214767)  
D245 3/29/16 Comcast Cable email to B. Sauer (IVC214787)  
D246 10/13/16 Gualtieri email to PECO Energy (IVC218574)  
D247 4/14/18 K. O'Halloran email to K. McGrath (IVC287817)  
D248 9/23/15 Gualtieri email to Bohler Engineering (IVC236778)  
D249 1/7/16 Aqua America email to Gualtieri (IVC06816)  
D250 2/15/16 W. Zoladz email to B. Sauer (IVC213999)  
D251 4/5/17 IVC Budget (IVC283534)  
D252 6/24/15 J. Schmitt email to Gilmore & Associates (IVC017843)  
D253 7/21/15 J. Schmitt email to Gilmore & Associates (IVC016869)  
D254 9/29/15 Gilmore & Associates letter to Bristol Borough (IVC276618)  
D255 2/12/16 Gilmore and Associates email to Bristol Borough  
(IVC065638)  
D256 4/12/16 M. Cordone email to Gualtieri (IVC079195)  
D257 4/22/16 N. Maychuk email to J. Schmitt (IVC077453)  
D258 4/25/16 G. Adelman email to R. Gualtieri (IVC078641)  
D259 5/18/16 G. Adelman email to B. Salerno (IVC078659)  
D260 8/23/16 Gualtieri email to Gilmore & Associates (IVC217064)  
D261 9/6/16 Gilmore & Associates email to Bristol Borough (IVC278175)  
D262 1/5/17 Gilmore & Associates letter to Gualtieri (IVC282091)  
D263 3/12/19 R. Brotherton email to B. Sauer (IVC270327)  
D264 K. O'Halloran motion for post-petition financing  
D265 12/19/18 A. Karalis email to W. Gerlach (IVC296763)  
D266 2/25/19 B. Sauer email to K. O'Halloran (IVC299355)  
D267 9/9/14 Gualtieri email to Prudential Savings Bank (PSB025905)  
D268 10/14/14 Gualtieri email to Prudential Savings Bank (IVC125766)  
D269 12/2/14 Gualtieri email to Prudential Savings Bank (PSB033720)  
D270 2/13/15 J. Schmitt email to Prudential Savings Bank (PSB057380)  
D271 1/4/15 J. Donato email to Gualtieri (IVC324285)  
D272 2/13/15 J. Schmitt email to Prudential Savings Bank (PSB057380)  
D273 3/16/15 J. Schmitt email to Gualtieri (IVC201552)  
D274 3/25/15 Prudential Savings Bank email to Gualtieri (B\_000323)  
D275 3/16/15 Gualtieri email to Bohler Engineering (IVC326452)  
D276 3/27/15 Bohler Engineering email to Gualtieri (IVC327050)  
D277 4/7/15 AmeriCorp Homes letter to Bohler Engineering (IVC210717)  
D278 4/24/15 J. Schmitt email to Gualtieri (IVC202059)  
D279 4/29/15 Bristol Borough email to Gilmore & Associates (IVC132003)  
D280 5/5/15 W. Zoladz email to B. McCool (IVC202469)  
D281 5/14/15 Gualtieri email to Prudential Savings Bank (PSB034962)  
D282 5/15/15 S. Frantanduono email to A. Nadalini (PSB034974)

D283 3/23/15 K. Venzie, Esq., letter to Gualtieri (IVC330633)  
D284 6/24/15 Lexon Surety Group letter to Gualtieri (IVC277878)  
D285 6/14/15 Gualtieri email to Prudential Savings Bank (PSB035269)  
D286 7/15/15 A. Nadalini email to N. DiGianivittorio (B\_000324)  
D287 7/15/15 A. Nadalini email to N. DiGianivittorio (PSB036411)  
D288 7/16/15 A. Nadalini email to N. DiGianivittorio (PSB036425)  
D289 7/16/15 A. Nadalini email to N. DiGianivittorio (PSB036418)  
D290 7/21/15 N. DiGianivittorio email to A. Nadalini (PSB060643)  
D291 7/22/15 J. Schmitt email to Prudential Savings Bank (PSB036569)  
D292 7/22/15 A. Nadalini email to N. DiGianivittorio  
D293 7/29/15 Bristol Borough email to Gualtieri (IVC330481)  
D294 8/3/15 J. Schmitt email to Prudential Savings Bank (PSB037002)  
D295 9/9/15 W. Zoladz email to Expo Construction (IVC331597)  
D296 8/26/15 Gualtieri email to Prudential Savings Bank (PSB037203)  
D297 10/14/15 J. Schmitt email to Gualtieri (IVC332467)  
D298 Island View Sales Activity Sheet (IVC020796)  
D299 10/13/15 J. Schmitt email to Gualtieri (IVC332447)  
D300 11/14/15 J. Schmitt email to Prudential Savings Bank (IVC066301)  
D301 11/25/15 Meeting Memorandum (IVC078768)  
D302 12/4/15 Elite Stairways email to B. Sauer (IVC210910)  
D303 12/7/15 J. Schmitt email to Kramer Insurance (IVC022196)  
D304 12/10/15 Meeting Memorandum (IVC080513)  
D305 12/15/15 AmCorp IVC accounts payable sheet (PSB038261)  
D306 12/16/15 Harlyn Consulting email to A. Nadalini (PSB063024)  
D307 12/18/15 D. Smith email to A. Migliorino (PSB063045)  
D308 12/24/-- A. Nadalini email to J. Schmitt (PSB063134)  
D309 1/6/16 D. Smith email to W. Sasso, Esq. (PSB038301)  
D310 12/31/15 D. Smith email to A. Migliorino (PSB038292)  
D311 1/11/16 Gualtieri email to N. Maychuk (IVC212140)  
D312 1/7/16 Gualtieri letter to A. Migliorino (IVC212148)  
D313 1/11/16 Site Inspection Memo (PSB063742)  
D314 1/11/16 J. Corrato email to A. Migliorino (PSB038335)  
D315 1/12/16 M. Cordone email to A. Migliorino (PSB063762)  
D316 1/14/16 J. Schmitt email to M. Cordone (IVC065725)  
D317 1/14/16 Prudential Savings Bank email to M. Cordone (PSB038383)  
D318 1/15/16 M. Cordone email to Prudential Savings Bank (PSB0838404)  
D319 1/19/16 M. Cordone email to Prudential Savings Bank (PSB063833)  
D320 1/29/16 Gualtieri email M. Cordone (IVC071700)  
D321 1/25/16 M. Cordone email Prudential Savings Bank  
D322 1/25/16 M. Cordone email to A. Migliorino (PSB063943)  
D323 1/25/16 A. Nadalini email to A. Migliorino (PSB057612)  
D324 1/27/16 J. Schmitt email to M. Cordone (IVC066852)  
D325 1/26/16 E. McAllister email to B. Sauer (IVC334033)  
D326 1/29/16 Gualtieri email to M. Cordone (IVC071799)  
D327 2/1/16 M. Cordone email to Prudential Savings Bank (PSB057633)  
D328 2/2/16 Prudential Savings Bank email to M. Cordone (PSB057671)  
D329 2/4/16 Prudential Savings Bank email to M. Cordone (PSB038531)

D330 2/5/16 Gualtieri email to M. Cordone (IVC071903)  
D331 2/10/16 M. Cordone email to Prudential Savings Bank (PSB057682)  
D332 2/10/16 Prudential Savings Bank email to M. Cordone (PSB038576)  
D333 2/12/16 M. Cordone email to Prudential Savings Bank (IVC069102)  
D334 2/12/16 M. Cordone email to Prudential Savings Bank (IVC038658)  
D335 1/22/16 Gualtieri email to J. Schmitt (IVC071719)  
D336 2/12/16 M. Cordone email to Prudential Savings Bank (PSB038666)  
D337 2/13/16 A. Migliorino email to M. Cordone (PSB038673)  
D338 2/19/16 D. Nasatir email to M. Cordone (IVC087291)  
D339 2/23/16 M. Cordone email to Prudential Savings Bank (PSB064218)  
D340 3/2/16 M. Cordone email to Gualtieri (IVC069644)  
D341 3/2/16 M. Cordone email to Gualtieri (IVC069671)  
D342 3/3/16 M. Cordone email to D. Nasatir (IVC214617)  
D343 3/29/16 A. Migliorino email to M. Cordone (PSB038977)  
D344 4/13/16 G. Reilly email to N. DiGianivittorio (PSB039042)  
D345 4/12/16 M. Cordone email to D. Nasatir (IVC214915)  
D346 4/22/16 Premium Excavating email N. Maychuk (IVC027597)  
D347 4/25/16 M. Cordone email to Prudential Savings Bank (PSB039076)  
D348 4/22/16 G. Reilly email to A. Migliorino (PSB039069)  
D349 4/25/16 D. Nasatir email to M. Cordone (PSB039098)  
D350 4/25/16 G. Adelman email to Gualtieri (IVC078641)  
D351 5/19/16 G. Adelman email to Gualtieri (IVC078662)  
D352 4/25/16 B. Sauer email to R. Gaskil (IVC238074)  
D353 4/26/16 Gualtieri email to M. Cordone (IVC073923)  
D354 5/4/16 D. Nasatir email to M. Cordone (PSB\_Lava0006412)  
D355 5/4/16 M. Cordone email to D. Nasatir (IVC074545)  
D356 5/11/16 D. Nasatir email A. Migliorino (PSB\_039172)  
D357 5/11/16 D. Nasatir email A. Migliorino (PRUD0019061)  
D358 5/17/16 Gilmore & Associates letter to Bristol Borough (IVC074531)  
D359 5/23/16 Gualtieri email to D. Pollack (PSB039270)  
D360 5/24/16 D. Nasatir email to A. Migliorino (PSB039288)  
D361 6/10/16 Gualtieri email to M. Cordone (IVC075340)  
D362 6/15/16 M. Cordone email to Gualtieri (IVC079821)  
D363 6/15/16 M. Cordone email to D. Nasatir (IVC079811)  
D364 6/16/16 G. Reilly email to D. Wilke (PSB039427)  
D365 7/8/16 Gualtieri email to N. Maychuk (IVC014789)  
D366 7/12/16 AmeriCorp Homes letter to R. White (IVC216482)  
D367 7/14/16 Gualtieri email to Bohler Engineering (IVC216509)  
D368 8/9/16 R. White email to Gualtieri (IVC216848)  
D369 9/1/16 D. Nasatir email to M. Cordone (IVC217258)  
D370 7/14/16 Gualtieri email to B. Sauer (IVC216539)  
D371 7/27/16 W. Zoladz email to D. Thomas (IVC334790)  
D372 8/26/16 N. Poduslenko email to M. Cordone (IVC217227)  
D373 10/13/16 Gualtieri email to Exelon Corp (IVC218574)  
D374 8/29/16 Premium Excavating email to Gualtieri (IVC217232)  
D375 4/22/16 N. Maychuk email to J. Schmitt (IVC010344)  
D376 Various Premium Excavating invoices

D377 7/27/16 Gualtieri email to Bohler Engineering (IVC216724)  
D378 8/1/16 Gualtieri email to R. White (IVC335594)  
D379 8/9/16 Gualtieri email to R. White (IVC216846)  
D380 9/23/14 Bohler Engineering email to Gualtieri (IVC321875)  
D381 10/13/14 Bohler Engineering email to G. Adelman (IVC125742)  
D382 7/27/16 N. Maychuk email to Gualtieri  
D383 8/31/16 IRS notice to AmeriCorp Construction LP  
D384 1/25/16 M. Cordone email to W. Sasso (IVC068895)  
D385 5/18/18 A. Caralis memo  
D386 IVC v. Prudential Savings Bank State Court Complaint  
D387 S. Ranganathan v. IVC Complaint  
D388 5/17/15 IVC Agreement of sale with A. Horwath (IVC276638)  
D389 10/18/15 IVC Agreement of Sale with M. Caione  
D390 P. Santos Co. versus AmeriCorp Notice of Judgment  
D391 12/10/15 United Installation Services IVC release (IVC022601)  
D392 AmeriCorp Management list of judgments (IVC310407)  
D393 J. Ferry, Esquire 7/28/16 email with S. Vorderberg (IVC238899)  
D394 4/25/16 N. Maychuk email to J. Schmitt (IVC077464)  
D395 5/3/10 Gualtieri letter to Caterpillar Financial (IVC174326))  
D396 1/9/13 J. Ferry email to Gualtieri (IVC010901)  
D397 5/29/15 Krameir Insurance email to J. Schmitt (IVC008745)  
D398 8/11/16 CBS Philly article re Durham Ridge (B\_000451)  
D399 10/2/14 Gualtieri email to Prudential Savings Bank (PSB025992)  
D400 12/30/14 Gualtieri email to J. Schmitt (IVC200874)  
D401 10/15/14 J. Schmitt email to Prudential Savings Bank  
D402 11/24/14 J. Schmitt email to Prudential Savings Bank (PSB029978)  
D403 4/7/15 Gualtieri letter to Bohler Engineering (IVC327212)  
D404 4/8/15 Clear Channel Outdoor email to Gualtieri (IVC327230)  
D405 4/20/15 Clear Channel Outdoor email to Gualtieri (IVC327372)  
D406 5/29/15 Gualtieri email to J. Schmitt (IVC009767)  
D407 6/12/15 Clear Channel Outdoor email to J. Schmitt (IVC008550)  
D408 6/23/15 Landmark Science & Engineering email to Gualtieri (IVC134719)  
D409 8/3/15 Bohler Engineering email to Gualtieri (IVC330703)  
D410 8/31/15 J. Schmitt email to J. Schmitt (IVC015938)  
D411 10/20/15 J. Schmitt email to S. Fratanduono (IVC020260)  
D412 10/21/15 A. Nadalini email to J. Schmitt (IVC014589)  
D413 12/3/15 J. Schmitt email to A. Nadalini (IVC022041)  
D414 1/18/16 J. Schmitt email to M. Cordone (IVC023380)  
D415 3/10/16 J. Schmitt email to Gualtieri (IVC024699)  
D416 3/15/16 Gualtieri email to Bohler Engineering (IVC350018)  
D417 7/20/16 Gualtieri email to J. Schmitt (IVC014825)  
D418 7/7/16 G. Lankford letter to K. Venzie, Esq. (LEX00099)  
D419 10/9/16 M. Cordone email to D. Nasatir  
D420 10/11/16 Notice of Default to Gualtieri (B\_001395)  
D421 11/1/16 Gualtieri email to J. Schmitt (IVC015177)  
D422 2/23/17 Penn Community Bank email to Gualtieri (IVC343742)

D423 4/13/18 R. Brotherton email to K. McGrath (IVC287815)  
D424 10/12/17 Glass Rattner report  
D425 5/31/12 Gualtieri email to Bohler Engineering (IVC11296)  
D426 Undated AmeriCorp Homes investors solicitation (IVC116238)  
D427 3/13/13 Gualtieri email to Prudential Savings Bank  
D428 6/10/13 W. Thiessen email to Gualtieiri (IVC314023)  
D429 6/12/13 S. Fratanduono email to T. Vento (PSB031095)  
D430 9/5/13 AmeriCorp Homes letter to J. Decker (IVC283895)  
D431 9/13/13 L. Wheelock email to Gualtieri (IVC116577)  
D432 11/21/13 L. Wheelock email to Gualtieri (IVC116577)  
D433 9/16/13 A. Brower email to Gualtieri (IVC315786)  
D434 4/10/14 N. DiGianivittorio email to S. Fratanduono (PSB058805)  
D435 CBRE- Island View Crossing 8/22/17 appraisal  
D436 11/18/13 Gualtieri email to Prudential Savings Bank (PSB028016)  
D437 2/11/14 J. Ferry email to Gualtieri (IVC317792)S  
D438 2/28/14 Prudential Savings Bank email to Gualtieri (IVC119910)  
D439 3/4/14 Gualtieri email to J. Schmitt (IVC119953)  
D440 1/5/16 Haryln Consultant Report  
D441 1/26/16 Harlyn Consultant Report  
D442 5/16/14 Prudential email to Gualtieri (PSB032541)  
D443 8/14/14 Prudential Savings Bank email to Gualtieri (PSB025720)  
D444 IVC customer deposit check  
D445 8/27/14 Gualtieri email to Prudential Savings Bank (IVC349493)  
D446 9/29/14 Gualtieri email to Prudential Savings Bank (IVC082646)  
D447 10/7/14 Prudential Savings Bank email to Gualtieri (PSB026031)  
D448 10/28/14 Prudential Savings Bank email to Gualtieri (IVC083808)  
D449 10/8/14 Loan Approval Summary (PSB059384)  
D450 10/20/14 A. Nadalini email to S. Fratanduono (PSB033338)  
D451 10.2.20 Expert Report  
D452 Intentionally omitted  
D453 3/20/15 M. Kolarik email to S. Fratanduono  
D454 6/2/15 J. Schmitt email to Kramer Insurance (IVC08810)  
D455 7/16/15 Kramer Insurance email to J. Schmitt (IVC008360)  
D456 1/25/16 IPFS email to J. Schmitt (IVC011892)  
D457 2/25/16 IPFS email to J. Schmitt (IVC026568)  
D458 3/16/16 J. Schmitt email to Gualtieri (IVC024610)  
D459 7/6/16 N. Maychuk email to Gualtieri (IVC015462)  
D460 7/15/16 J. Schmitt email to N. Maychuk (IVC026000)  
D461 4/1/16 J. Schmitt email to Aqua America (IVC024855)  
D462 7/22/15 A. Nadalini email to C. Maier  
D463 7/16/15 A. Nadalini email to C. Maier (PSB036425)  
D464 7/21/15 N. DiGianivittrio email to D. Krauter (PSB060643)  
D465 Intentionally omitted  
D466 L. Albrecht email to Prudential Savings Bank (PSB037022)  
D467 8/6/15 J. Schmitt email to Prudential Savings Bank (PSB060658)  
D468 8/19/15 Gualtieri email to Republic Bank (IVC009482)  
D469 9/9/15 Comcast Cable email to W. Zoladz (IVC206345)

D470 9/29/25 J. Hannon email to W. Zoladz (IVC332118)  
D471 10/13/15 J. Schmitt email to Gualtieri (IVC332447)  
D472 10/27/15 Geo Structures email to J. Schmitt (IVC011338)  
D473 11/2/15 N. Maychuk email to Gualtieri (IVC065320)  
D474 11/18/15 Comcast Cable email to B. Sauer (IVC209469)  
D475 12/31/15 D. Smith email to A. Migliorino (PSB038292)  
D476 1/16/16 D. Smith email to W. Sasso (PSB038301)  
D477 1/11/16 Gualtieri email to N. Maychuk (IVC212140)  
D478 2/4/16 Gualtieri email to Gilmore & Associates (IVC071874)  
D479 2/18/16 PECO Energy email to Gualtieri (IVC070253)  
D480 3/2/16 Gualtieri email to J. Schmitt (IVC072352)  
D481 3/24/16 PECO Energy email to B. Sauer (IVC214767)  
D482 3/29/16 Comcast Cable email to B. Sauer (IVC214787)  
D483 4/25/16 G. Adelman email to Gualtieri (IVC078641)  
D484 5/19/16 G. Adelman email to Gualtieri (IVC078662)  
D485 5/23/16 Heritage Floors email to J. Schmitt (IVC026587)  
D486 6/13/16 Heritage Floors email J. Schmitt (IVC026588)  
D487 6/21/16 B. Sauer email to Heritage Floor (IVC028013)  
D488 6/22/16 M. Cordone email to D. Nasatir (PRU0020613)  
D489 9/27/16 Heritage Floors email to B. Sauer (IVC026591)  
D490 5/23/16 Gualtieri email to D. Pollack (PSB039270)  
D491 6/14/16 B. Sauer email to R. Gualtieri (IVC080005)  
D492 6/16/16 G. Reily email to D. Manning (PSB039427)  
D493 6/30/16 M. Cordone email to D. Nasatir (PRUD0047879)  
D494 7/27/16 N. Maychuk email to Gualtieri  
D495 8/26/16 N. Poduslenko email M. Cordone (IVC217227)  
D496 8/29/16 Premium Excavating email to Gualtieri (IVC217232)  
D497 9/1/16 D. Nasatir email to M. Cordone (IVC217258)  
D498 9/6/16 Gilmore & Associates email to Bristol Borough (IVC278175)  
D499 9/6/16 Gualtieri email to T. Petrecz (IVC217264)  
D500 1/5/17 Gilmore & Associates email to Gualtieri (IVC282090)  
D501 1/5/17 Gilmore & Associates letter to Gualtieri (IVC282092)  
D502 6/22/17 T. Petrecz email to Gualtieri  
D503 12/18/18 A. Karalis email to W. Gerlach (IVC296743)  
D504 3/27/19 J. Nagele email to R. Brotherton (IVC300603)  
D505 4/13/19 Kevin O'Halloran email to Ebert Engineering (IVC301672)  
D506 4/29/19 A. Karalis email to E. George (IVC302301)  
D507 11/26/14 IVC note  
D508 10/12/17 K. Hamilton report  
D509 476 Street Road Associates: Bank Statements  
D510 476 Street Road Associates: Check Registers  
D511 Amcorp CE Inc.: Bank Statements  
D512 Amcorp CE Inc.: Check Registers  
D513 Amcorp CE Inc.: General Ledgers  
D514 Amcorp IVC Inc.: Bank Statements  
D515 Amcorp IVC Inc.: Check Registers  
D516 Amcorp IVC Inc.: General Ledgers

D517 Amcorp IVC Inc.: Accounts Payable  
D518 Americorp Abstract: Check Registers  
D519 Americorp Abstract: General Ledgers  
D520 Americorp Abstract: Financial Statements  
D521 Americorp Abstract: Tax Returns  
D522 Americorp Construction Inc.: Bank Statements  
D523 Americorp Construction Inc.: Check Registers  
D524 Americorp Construction Inc.: General Ledgers  
D525 Americorp Construction Inc.: Tax Returns  
D526 Americorp Construction LP: Bank Statements  
D527 Americorp Construction LP: Check Registers  
D528 Americorp Construction LP: General Ledgers  
D529 Americorp Construction LP: Financial Statements  
D530 Americorp Construction LP: Tax Returns  
D531 Americorp Construction LP: Accounts Payable  
D532 Americorp Construction LP: Vendor, Invoices, etc.  
D533 Americorp Homes, Inc.: Bank Statements  
D534 Americorp Homes, Inc.: Check Registers  
D535 Americorp Homes, Inc.: General Ledgers  
D536 Americorp Homes, Inc.: Financial Statements  
D537 Americorp Homes, Inc.: Tax Returns  
D538 Americorp Homes, Inc.: Vendor, Invoices, etc.  
D539 Americorp Management: Bank Statements  
D540 Americorp Management: General Ledgers  
D541 Americorp Management: Financial Statements  
D542 Americorp Management: Tax Returns  
D543 Americorp Mortgage: Bank Statements  
D544 Americorp Mortgage: Check Registers  
D545 Americorp Mortgage: General Ledgers  
D546 Americorp Reality: Check Registers  
D547 Americorp Reality: General Ledgers  
D548 Americorp Reality: Financial Statements  
D549 Americorp Reality: Tax Returns  
D550 Calnshire Estates: Bank Statements  
D551 Calnshire Estates: Check Registers  
D552 Calnshire Estates: General Ledgers  
D553 Calnshire Estates: Financial Statements  
D554 Calnshire Estates: Tax Returns  
D555 Calnshire Estates: Appraisals  
D556 Durham Manor: Bank Statements  
D557 Durham Manor: Check Registers  
D558 Durham Manor: General Ledgers  
D559 Durham Manor: Financial Statements  
D560 Durham Manor: Tax Returns  
D561 Fidelity Properties: Bank Statements  
D562 Fidelity Properties: Check Registers  
D563 Fidelity Properties: Tax Returns



D564 Hunters Crossing: General Ledgers  
D565 Island View Crossing II, LP: Bank Statements  
D566 Island View Crossing II, LP: Check Registers  
D567 Island View Crossing II, LP: General Ledgers  
D568 Island View Crossing II, LP: Financial Statements  
D569 Island View Crossing II, LP: Appraisals  
D570 Island View Crossing II, LP: Vendor, Invoices, etc.  
D571 Island View Properties, Inc.: Bank Statements  
D572 Island View Properties, Inc.: Check Registers  
D573 Island View Properties, Inc.: General Ledgers  
D574 Island View Properties, Inc.: Financial Statements  
D575 Kendall Court: General Ledgers  
D576 Kendall Court: Financial Statements  
D577 Kendall Court: Tax Returns  
D578 One South State Street Associates: Bank Statements  
D579 One South State Street Associates: Check Registers  
D580 One South State Street Associates: Financial Statements  
D581 One South State Street Associates: Appraisals  
D582 Penn Finance: Bank Statements  
D583 Penn Finance: Check Registers  
D584 Penn Finance: General Ledgers  
D585 Ron Gualtieri: Bank Statements  
D586 Ron Gualtieri: Check Registers  
D587 Ron Gualtieri: Tax Returns  
D588 Steeple Run, LP: Bank Statements  
D589 Steeple Run, LP: Check Registers  
D590 Steeple Run, LP: General Ledgers  
D591 Steeple Run, LP: Financial Statements  
D592 Steeple Run, LP: Tax Returns  
D593 Steeple Run, LP: Appraisals  
D594 Americorp Homes, Inc. and Subsidiaries Consolidated Financial Statements: Financial Statements  
D595 Americorp Homes, Inc. and Subsidiaries Consolidated Financial Statements: Tax Returns  
D596 5/30/14 Amendment to Agreement of Limited Partnership (IVC211350)  
D597 10/16/14 J. Schmitt email to Prudential (PSB033304)  
D598 4/6/15 Prudential email to J. Schmitt  
D599 5/14/15 Prudential email to Gualtieri  
D600 5/28/15 Gualtieri email to Prudential  
D601 6/12/15 Prudential email to Gualtieri  
D602 7/22/15 A. Nadalini email to N. DiGianivittorio (PSB036580)  
D603 8/12/15 M. Brusco email to A. Nadalini (PSB060671)  
D604 9/30/15 T. Forsyth email to Gualtieri (IVC349891)  
D605 1/19/16 M. Cordone email to Prudential (PSB063833)  
D606 Island View Complaint  
D607 7/23/12 J. Schmitt email to Gualtieri (IVC190730)

D608 7/24/12 J. Schmitt email to Gualtieri (IVC190748)  
D609 7/26/12 J. Schmitt email to Gualtieri (IVC190990)  
D610 Intentionally omitted  
D611 7/27/12 J. Schmitt email to Gualtieri (IVC191126)  
D612 8/8/12 J. Schmitt email to Gualtieri (IVC191761)  
D613 8/9/12 M. Doyle email to Gualtieri (IVC191771)  
D614 8/13/12 J. Schmitt email to Gualtieri (IVC191958)  
D615 8/15/12 AmeriCorp Homes email to Gualtieri (IVC192070)  
D616 8/17/12 AmeriCorp Homes email to Gualtieri (IVC192138)  
D617 8/21/12 J. Schmitt email to Gualtieri (IVC192192)  
D618 8/21/12 J. Schmitt email to Gualtieri (IVC192195)  
D619 8/24/12 AmeriCorp Homes email to Gualtieri (IVC192290)  
D620 8/24/12 J. Schmitt email to Gualtieri (IVC192302)  
D621 8/24/12 J. Schmitt email to Gualtieri (IVC192323)  
D622 8/27/12 J. Schmitt email to Gualtieri (IVC192347)  
D623 8/29/12 J. Schmitt email to Gualtieri (IVC192393)  
D624 8/30/12 AmeriCorp Homes email to Gualtieri (IVC192470)  
D625 9/5/12 Temperance House email to Gualtieri (IVC192499)  
D626 8/31/12 Statement (IVC192500)  
D627 9/11/12 Gualtieri email to J. Schmitt (IVC192770)  
D628 9/8/12 AmeriCorp Homes email to Gualtieri (IVC193492)  
D629 9/26/12 J. Schmitt email to Gualtieri (IVC194044)  
D630 9/28/12 J. Schmitt email to Gualtieri (IVC194113)  
D631 10/18/12 J. Schmitt email to Gualtieri (IVC194600)  
D632 11/16/12 J. Ferry, Esquire email to Gualtieri (IVC195190)  
D633 11/26/12 AmeriCorp email to Gualtieri (IVC195409)  
D634 11/28/12 J. Schmitt email to Gualtieri (IVC195545)  
D635 12/10/12 K. Hutson email to J. Schmitt (IVC195647)  
D636 12/28/12 K. Hutson email to J. Schmitt (IVC195689)  
D637 Small Claims Complaint (IVC195995)  
D638 H2, LLC v. AmeriCorp Homes Complaint (IVC195999)  
D639 Small Claims Complaint (IVC196022)  
D640 Small Claims Complaint (IVC196149)  
D641 6/4/13 J. Schmitt letter to Internal Revenue Service (IVC196541)  
D642 7/29/13 AmeriCorp Homes letter to Bureau of Labor Law  
Compliance (IVC197045)  
D643 7/29/13 AmeriCorp Homes letter to Pennsylvania Bureau of Labor  
Law Compliance  
D644 Sterling Kitchens Sale v. AmeriCorp Homes Complaint (IVC197428)  
D645 5/21/14 Pennsylvania Department of Revenue email to Gualtieri  
(IVC199120)  
D646 6/12/14 Fidelity Properties emails to T. Grafton (IVC199292)  
D647 6/13/14 AmeriCorp Homes letter Old Hickory Insurance Agency  
(IVC199302)  
D648 Alan Carcifi v. AmeriCorp Homes request for production of  
documents (IVC199401)  
D649 6/20/14 AmeriCorp Construction payable ledger (IVC199418)

D650 6/24/14 IVC escrow release request (IVC199431)  
D651 6/30/14 AmeriCorp Homes letter to Miller Law Group (IVC199623)  
D652 Olden Paint & Fresh Look Flooring general release re AmeriCorp Construction (IVC200049)  
D653 9/28/11 West Caln Township letter to AmeriCorp Homes (IVC201608)  
D654 9/1/15 AmeriCorp letter to Makefield Executive Chorus (IVC206127)  
D655 11/25/15 J. Ferry, Esq., letter to H. Wolcot, Esq. (IVC210339)  
D656 12/15/15 AmeriCorp IVC account payable (IVC211215)  
D657 1/8/13 M. Labrum, Esq., letter to Gualtieri (IVC214596)  
D658 11/22/11 Scott letter to Gualtieri (IVC224419)  
D659 1/6/10 First American letter to AmeriCorp Mortgage (IVC222685)  
D660 7/22/11 American Express letter to Gualtieri (IVC222884)  
D661 Obermayer legal bills  
D662 Obermayer Proof of Claim in Island View bankruptcy case [Claims Register No. 23]  
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D665 Proof of Claim of Bucks County Tax Claim Bureau [Claims Register No. 1]  
D666 Proof of Claim of Monica L. Caione [Claim Register No. 3]  
D667 Proof of Claim of Anthony A. Horwath [Claim Register No. 4]  
D668 Proof of Claim of Redevelopment Authority of Bucks County [Claim Register No. 5]  
D669 Proof of Claim of Premium Excavating, LLC [Claim Register No. 7]  
D670 Proof of Claim of Kaplin Stewart Meloff Reiter & Stein, P.C. [Claim Register No. 8]  
D671 Kaplin Stewart Meloff Reiter & Stein, P.C.  
D672 Proof of Claim of Bohler Engineering PA, LLC [Claim Register No. 9]  
D673 Proof of Claim of Anthony Horwath [Claim Register No. 10]  
D674 Proof of Claim of Peter Bridge [Claim Register No. 11]  
D675 Proof of Claim of Jane Q. Bridge [Claim Register No. 12]  
D676 Proof of Claim of IPFS Corporation [Claim Register No. 13]  
D677 Proof of Claim of Stradley Ronon Stevens & Young, LLP [Claim Register No. 14]  
D678 Proof of Claim of Khandulans Ranganathan [Claim Register No. 15]  
D679 Proof of Claim of Samira Ranganathan [Claim Register No. 16]  
D680 Proof of Claim of McElderry Drywall, Inc. [Claim Register No. 17]  
D681 Proof of Claim of Bucks County Electric Works, Inc. [Claim Register No. 18]  
D682 Proof of Claim of Frank Del Grasso [Claim Register No. 19]  
D683 Proof of Claim of John R. Diaz Administrator of the Estate of Dawn O'Neil [Claim Register No. 20]

D684 Proof of Claim of Benjamin A. Mastridge, Sr. [Claim Register No. 21]  
D685 Proof of Claim of Joseph & Phyllis Silva [Claim Register No. 22]  
D686 All Exhibits identified by the Trustee

Respectfully submitted,

Dated: November 16, 2020

By: /s/ Edmond M. George  
Edmond M. George, Esquire  
Nicholas Poduslenko, Esquire  
Michael D. Vagnoni, Esquire  
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Centre Square West  
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Counsel to Prudential Savings Bank

Exhibit “A”

Exhibit “A”

**UNITED STATES BANKRUPTCY COURT  
FOR THE EASTERN DISTRICT OF PENNSYLVANIA**

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**In re:**

**ISLAND VIEW CROSSING II, L.P.,  
  
Debtor.**

---

**KEVIN O'HALLORAN, in his capacity  
as Chapter 11 Trustee for ISLAND  
VIEW CROSSING II, L.P.,**

**Plaintiff,**

**vs.**

**PRUDENTIAL SAVINGS BANK,  
  
Defendant.**

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:  
: **CHAPTER 11**  
:  
: **BANKRUPTCY NO. 17-14454 (ELF)**  
:  
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:  
: **ADVERSARY NO. 17-00202 (ELF)**  
: **ADVERSARY NO. 18-00280 (ELF)**  
: **(Consolidated)**  
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**EXHIBIT “A”**

**DEPOSITION OF RON GUALTIERI (Vol. I)  
FEBRUARY 25, 2020**

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Exhibit “B”

Exhibit “B”

**UNITED STATES BANKRUPTCY COURT  
FOR THE EASTERN DISTRICT OF PENNSYLVANIA**

---

**In re:**

**ISLAND VIEW CROSSING II, L.P.,  
  
Debtor.**

---

**KEVIN O'HALLORAN, in his capacity  
as Chapter 11 Trustee for ISLAND  
VIEW CROSSING II, L.P.,**

**Plaintiff,**

**vs.**

**PRUDENTIAL SAVINGS BANK,  
  
Defendant.**

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: **ADVERSARY NO. 17-00202 (ELF)**  
: **ADVERSARY NO. 18-00280 (ELF)**  
: **(Consolidated)**  
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# **EXHIBIT “B”**

**DEPOSITION DESIGNATION OF RON GUALTIERI (Vol. II)  
FEBRUARY 26, 2020**

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Exhibit “C”

Exhibit “C”

**UNITED STATES BANKRUPTCY COURT  
FOR THE EASTERN DISTRICT OF PENNSYLVANIA**

---

**In re:**

**ISLAND VIEW CROSSING II, L.P.,  
  
Debtor.**

---

**KEVIN O'HALLORAN, in his capacity  
as Chapter 11 Trustee for ISLAND  
VIEW CROSSING II, L.P.,**

**Plaintiff,**

**vs.**

**PRUDENTIAL SAVINGS BANK,  
  
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: **ADVERSARY NO. 17-00202 (ELF)**  
: **ADVERSARY NO. 18-00280 (ELF)**  
: **(Consolidated)**  
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**EXHIBIT “C”**

**DEPOSITION DESIGNATION OF RON GUALTIERI (Vol. III)  
March 11, 2020**

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Exhibit “D”

Exhibit “D”

# **EXHIBIT “D”**

**Designation of Partial Transcript of Hearing Testimony of Renato Gualtieri**  
**Held on October 16, 2017<sup>1</sup>**

<b>Page</b>	<b>Description</b>
30:22-24	Q: Oh, okay. So, can you explain what services that IVC received for the expenditures, they're listed in the Americorp CE account? Can you tell us --
31:12-22	Q: So, for example, Tax Claim Bureau of Chester County, is that IVC's obligation? A: No, it is not. Q: Is Citizen Bank's payments, are those IVC's obligations? A: No, they're not. Q: Are payments to Fidelity Properties, are those IVC's obligations? A: No, they're not. Q: Was Antonio Gualtieri was he an employee of IVC? A: No, he was not.
32:3-13	Q: Okay. So how about paid office phone bill to Comcast, is that an IVC obligation? A: No. Q: And how about payments to Mr. Sodonik (phonetic), were those IVC obligations? A: No, they were not. Q: And Mr. Sodonik was a former employee of whom? A: I believe Americorp Construction, L.P. Q: And that gentleman sued you personally for non-payment of his salary, didn't he? A: He did.

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<sup>1</sup> The testimony designated herein is from the October 16, 2017 consolidated hearing on (i) the Motion of Prudential Saving Bank to Convert the Chapter 11 case of Island View Crossing II, L.P. (Case No. 17-14454 (ELF)) and related cases One State Street Associates, L.P. (Case No. 17-14291 (ELF)), Calnshire Estates, LLC (Case No. 17-14457 (ELF)) and Steeple Run LP (Case No. 17-14458) to cases under Chapter 7 of the Bankruptcy Code or, in the alternative, to appoint Chapter 11 Trustees [Island View Docket No. 34], and (ii) the Motion of Island View Crossing II, L.P. for authority to Obtain Post-Petition Financing Pursuant to Sections 364 and 363 of the Bankruptcy Code [Island View Docket No. 55].



Exhibit “E”

Exhibit “E”

# **EXHIBIT “E”**

Designation of Partial Transcript of Hearing Testimony of Michael Cordone  
Held on October 19, 2017<sup>1</sup>

<b>Page</b>	<b>Description</b>
2:12-17	Q: Mr. Cordone, what is your profession? A: I'm a lawyer. Q: And how long have you been a lawyer? A: For 27 years. Q: And by whom are you presently employed? A: Stradley Ronon Stevens & Young.
3:7-12	Q: In November of 2015, did you speak to Ron Gaultieri about a possible representation? A: We did. Q: And did Mr. Gaultieri retain Stradley Ronon? A: He did.
40:21-25	Q: The delay of the escrow release, did it cause the debtor to default on any of its obligations? A: Are you speaking of the February 12 escrow release?
41:1-5	Q: Well, you said one of the escrow releases was delayed. Do you recall that testimony? A: Yes. Certainly, I can say that as to the February 12, 2016 escrow release was delayed, yes.
41:18-25	Q: But what I'm saying is in between the time the request was made and it was ultimately funded, did somebody sue the debtor? Did somebody refuse to provide services to the debtor? A: I don't know whether someone might have sued in the months in between. There may have been a lawsuit. Q: Well, you don't know whether there was ...
42:1-2	... or wasn't; right? A: Against the debtor? I don't know.
42:6-15	Q: Is Matt Hall from Argosy Credit? A: Yes. Q: And do you recollect this e-mail being sent to you? A: I do.

---

<sup>1</sup> The testimony designated herein is from the October 19, 2017 consolidated hearing on (i) the Motion of Prudential Saving Bank to Convert the Chapter 11 case of Island View Crossing II, L.P. (Case No. 17-14454 (ELF)) and related cases One State Street Associates, L.P. (Case No. 17-14291 (ELF)), Calnshire Estates, LLC (Case No. 17-14457 (ELF)) and Steeple Run LP (Case No. 17-14458) to cases under Chapter 7 of the Bankruptcy Code or, in the alternative, to appoint Chapter 11 Trustees [Island View Docket No. 34], and (ii) the Motion of Island View Crossing II, L.P. for authority to Obtain Post-Petition Financing Pursuant to Sections 364 and 363 of the Bankruptcy Code [Island View Docket No. 55].

	<p>Q: And Mr. Hall is telling you three of the primary concerns that they had and discussing with you the ability to provide a DIP to the debtor; right?</p> <p>A: Correct.</p>
43:6-25	<p>Q: And can you summarize what the discussion was with respect to number 1?</p> <p>A: As to number 1, pretty much as it's stated there.</p> <p>Q: That securing initial buyers would be very difficult, given the cloud of the bankruptcy and existing lawsuits for those who put down deposits, and either he won't get any interest or would have to reduce his expected asking price and that lower prices could permeate through the entire development, he told you that?</p> <p>A: That's what he said, yes.</p> <p>Q: And with respect to Durham Ridge, he had the same concern, same concerns about his execution and completion of Durham Road or Durham Ridge subdivision and the general backlash and related costs and distractions?</p> <p>A: Yes.</p> <p>Q: He discussed that with you?</p> <p>A: Yes.</p>
46:20-25	<p>Q: I'm not talking on the payment to the RDA upon sale of the unit. I'm talking about the \$129,000 that came out of the first draws for management and overhead. Do you see anything in the loan agreement that authorized that payment?</p> <p>A: No.</p>

Exhibit “F”

Exhibit “F”

# **EXHIBIT “F”**

**Designation of Partial Transcript of Hearing Testimony of Renato Gualtieri and Colloquy between Counsel for the Debtor and the Court Held on November 13, 2017<sup>1</sup>**

<b>Page</b>	<b>Description</b>
5:22-25	Q: Okay. Now, last week I asked you about mechanic's liens that may have been in place or judgments that may have been in place with respect to Durham and I think you said you don't recollect there being any mechanic's liens on Durham in ...
6:1-2	... 2009? A: That's correct.
6:3-12	Q: Well, what if I were to tell you that there were at least twenty lawsuits filed against Durham and your entities providing services at Durham in that time period. Would you have a reason to dispute that? A: Were they mechanic's liens? Q: I didn't say they were mechanic's liens, but what if were to tell you there were twenty lawsuits that included mechanic's liens against Durham Manner and your related entities. Would you dispute that? A: I would not dispute that.
10:6-18	Q: And then if you go down you will see that First Horizon Home Loans confessed a judgment against you on 9/21/09, against Durham Manner, right? A: We're still on Page 2? Q: Yes. A: Oh, I see it down at the bottom here. Q: Now, what is -- A: I see it, yes. Q: -- Americorp Management, Inc.? A: That was the construction management company. Q: So, that was the construction management company that you used in Durham? A: Yes.
10:22-23	Q: Who were the principals of Americorp Management, Inc.? A: I am.
13:8-17	Q: Now, 2012 is well after you got the loan from Prudential, isn't it? A: Yes.

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<sup>1</sup> The testimony designated herein is from the November 13, 2017 consolidated hearing on (i) the Motion of Prudential Saving Bank to Convert the Chapter 11 case of Island View Crossing II, L.P. (Case No. 17-14454 (ELF)) and related cases One State Street Associates, L.P. (Case No. 17-14291 (ELF)), Calnshire Estates, LLC (Case No. 17-14457 (ELF)) and Steeple Run LP (Case No. 17-14458) to cases under Chapter 7 of the Bankruptcy Code or, in the alternative, to appoint Chapter 11 Trustees [Island View Docket No. 34], and (ii) the Motion of Island View Crossing II, L.P. for authority to Obtain Post-Petition Financing Pursuant to Sections 364 and 363 of the Bankruptcy Code [Island View Docket No. 55].

	<p>Q: So, after you got the loan there were a number of additional complaints and liens that were filed against Americorp Management, Americorp Homes, Inc., and Americorp Construction, L.P., right?</p> <p>A: It seems to me, yes.</p> <p>Q: So why weren't these vendors being paid in 2012?</p> <p>A: I don't recall.</p>
13:21-25	<p>Q: And do you have a recollection of who's tax liability that is, that federal tax lien that was placed on 2/21/12?</p> <p>A: Isn't the defendant right here, Americorp Management. It says it right here, right?</p> <p>Q: Yeah. I'm asking are you aware whether a federal tax...</p>
14:1-2	<p>... lien was filed against Americorp Management, Inc.?</p> <p>A: Yes.</p>
14:3-17	<p>Q: So, right as we sit here today there's a federal tax lien against you personally, right?</p> <p>A: That's correct.</p> <p>Q: There's a federal tax lien against Americorp Management, Inc., right?</p> <p>A: Yes.</p> <p>Q: There's a federal tax lien against Americorp Construction, L.P.?</p> <p>A: That's correct.</p> <p>Q: And there's a federal tax lien against Americorp Construction, Inc.?</p> <p>A: Yes.</p> <p>Q: And are you aware that the IRS is attempting to levy on those tax liens?</p> <p>A: They've recorded liens, yes.</p>
23:3-22	<p>Q: Okay. Let's go to IVC-011022. This is an email from Joe Hannon to --</p> <p>A: Which -- oh, 22.</p> <p>Q: -- you and to Judy Schmidt. He says. "Any status on the check." Do you see that?</p> <p>A: Mm-hmm.</p> <p>Q: Now, when you received this did you call him back on the phone and say we don't owe you any money?</p> <p>A: No. But we ultimately paid him everything. We -- as we received our money -- if you remember, as we talked about on Thursday, we took the majority of our site improvement management fee and allocated it towards permits, professional fees that were necessarily to start Island View that were not budgeted into the loan. So, we may have been waiting for other management fees or draws to come through. Ultimately, we paid him in full.</p> <p>Q: So, your use of the management --</p> <p>A: We had massive delays. I mean we -- yes, we paid the guy.</p>
35:25	<p>Q: Were you aware that Judy back in 2014 was providing the ...</p>
36:1-6	<p>... checks and the credit card receipts to support the draw requests?</p> <p>A: Yes, but they were for restricted cash accounts.</p> <p>Q: Right. You didn't have any problem with her providing that detail, did you?</p> <p>A: No.</p>

42:8-19	<p>Q: At the time that you made the request for the payments to Premium Excavating were there other monies that were due to Premium Excavating that pre-dated the monies that were part of the \$216,000 dollar escrow release?</p> <p>A: I don't believe so.</p> <p>Q: Can you go to No. 214?</p> <p>A: I see it.</p> <p>Q: Can you go to the last page of that document?</p> <p>A: The last page?</p> <p>Q: Yes. Do you recall that the escrow release was in the amount of 216,061.75?</p> <p>A: Yes.</p>
42:20-25	<p>Q: And if you look at this, which is a customer open balance, it shows that there are open balances for invoices of 5/30/15 of 47,000; 7/10/15 of 123,000; 9/30/15, 192,000 -I mean 231,000; 11/30/15, 192,000; and 1/30/16, 100,225.50. Do you see that?</p> <p>A: Yes.</p>
43:1-23	<p>Q: Then another invoice 4/30/16 in the amount of 229,695. So, when you received the \$216,000 dollars and you paid it to Premium Excavating was there still money that was due to Premium Excavating?</p> <p>A: Like I said, number one, this wasn't reconciled, but secondly most of it, if not all of it, was in retainages with the municipal engineer as I said on Thursday. Secondly, there was a large portion of the sanitary and some of the storm that was not released for whatever reasons with the borough engineer whether they need a video, what have you, to the tune of hundreds of thousands of dollars. I don't remember exactly; it's quite a bit, \$4, \$500,000 dollars.</p> <p>So, he built it, but it was never released. So, do we owe it? And from what I - and the way our contract works with the site contractor their invoices are not valid and due unless approved and released by the township engineer and approved by the borough. So, they can send you all the statements they want. Contractually no, it wasn't due. And it's still sitting in a letter of credit.</p> <p>Q: Did you ever make application for them?</p> <p>A: Yes.</p> <p>Q: And the borough engineer didn't sign-off on the work?</p> <p>A: That's correct.</p>
44:15-25	<p>Q: Do you know when you learned of the denial?</p> <p>A: Yeah, they send you an explanation with the escrow release. In other words you made this application and here's what we approve. Then they usually give you a little letter of why they cut some of the line items, yes.</p> <p>Q: So, is it your testimony that --</p> <p>A: And Premium knew that as well. Hence, he went and then continued to do curb and binder after that knowing that the money was still at the township.</p> <p>Q: So, the failure to pay them didn't keep him from providing any services, right?</p>
45:1-12	<p>A: No. I didn't pay him because it wasn't released. It was never released with the township. As a result contractually between Americorp IVC and Premium the money is not due until its released. Its not you just bill me and then its 30-day net. It's very -- its industry standard. They know that we have to get our</p>

	escrow release monies to pay them; very normal. It wasn't released. He understood that. So, you know, there's other punch list related line items that need to be completed and then eventually we'll wind-up getting it, but at this time this is a statement, but not all of it is due. As a matter of fact, I don't think any of it is due.
46:5-9	Q: Now, sir, with respect to the vendors that you had at Durham Manner that were listed in the schedule of lawsuits and mechanic's lien claims did you use any of those contractors at IVC? A: I don't know. I'd have to go look. I don't think so.
83:8-13	Q: Do you specifically know whether or not any Durham Manner obligations were paid from the sale of those lots, and when I say Durham Manner obligations, to any third-parties? A: I don't recall. The entire proceeds from the sale of the final lots went to into a restricted account, another restricted cash account, with Prudential Savings Bank.
84:4-24	THE COURT: Before you do can I ask a question about the last subject? MR. SMITH: Sure. THE COURT: You answered a bunch of questions that Mr. George asked you that suggested that there were a number of subcontractors who claimed that they were unpaid at Durham. That's when you look at the list of lawsuits and mechanic's liens. The lot proceeds that you just referenced, the proceeds from the sale of the lots after the 1.4 million paid off Prudential -- THE WITNESS: Yes. THE COURT: -- you said that those proceeds went into a restricted account at Prudential. THE WITNESS: Every dime. THE COURT: That was my next question, every penny of it? THE WITNESS: Every dime. THE COURT: And was that the same restricted accounts we've been talking about when you were drawing down for site improvements at IVC?
227:3-25	THE COURT: Yeah, but they also paid draws after that that are documents. MR. SMITH: They delayed paying those draws and they paid them directly to the subs. If that's the way that they wanted to do it then they were entitled to do that apparently under their own loan documents, but if they're going to pay subs directly, Your Honor, why wait a month to fund them? There is no explanation in the record as to why in December it took a month to fund those draws into January if they were cutting the checks directly to the subs anyway. THE COURT: But did I hear that that's what destroyed the project? MR. SMITH: It didn't destroy the project. THE COURT: So, what difference does it make? MR. SMITH: Because it's a number of events that ultimately lead up to the creation of the default. There is nothing in the record that demonstrates or that even suggests that the delay in funding subs lead to any disastrous effects. Its just simply part of the record. But what ultimately happens is that on February 12th when the escrow release is submitted and is not honored, and then one



	week later on February 19th of 2016 the bank declares a default based upon the non-payment of obligations that would have...
228:1-4	... been paid pursuant to that escrow release on February 12th. It is unimaginable that there is any other conclusion to those set of events other than that the bank had a fulfilling prophecy there. It wanted to create the default.

Exhibit “G”

Exhibit “G”

# **EXHIBIT “G”**

**Designation of Partial Transcript of Hearing Testimony of Renato Gualtieri**  
**Held on November 16, 2017<sup>1</sup>**

<b>Page</b>	<b>Description</b>
161:6-18	... So, does that refresh your recollection of whether you were in default of the A&D loan with First Horizon before you obtained a refinance from Prudential? A: I don't know if they're talking about a forbearance agreement. We never even entered into a forbearance agreement with them. Show me that one, but -- Q: I didn't ask you about the forbearance agreement. A: -- believe this is when they were trying to default us on a technicality. That was -- yes. Q: Well, is it a technicality that you didn't make your April monthly payment? Is that a technicality? A: Its not true. Its an escrow. We had escrows. We had an interest reserve.
163:4-12	Q: Okay. Go to 151. A: Okay. Q: So, this document dated as of June -- a bunch of whereas paragraphs. Do you see those? A: I see it. Can you see the signature page? Q: So, do you see Page 2 of that document? A: Yeah. I'm looking at Page 2, yes. Q: Okay. If you look at the third whereas from the bottom --
163:13-23	Q: -- it says, "The obligor has committed the following defaults under the forbearance agreement; collectively, the existing defaults. One, failure to pay the required monthly principal payments of 1375 beginning April 1st, 2009." Is that a true statement that you didn't make payments on April 1st, 2009? A: No. They're referring to the curtailment in the form of principal reduction. They were trying to get out. Look at the signature page. We never agreed to any of this.
170:2-5	Q: Okay. Can you go to number 153? Do you recall whether in November of 2009 the bank, and I'm talking specifically about First Horizon Home Bank, had confessed judgments? A: Yes.

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<sup>1</sup> The testimony designated herein is from the November 16, 2017 consolidated hearing on (i) the Motion of Prudential Saving Bank to Convert the Chapter 11 case of Island View Crossing II, L.P. (Case No. 17-14454 (ELF)) and related cases One State Street Associates, L.P. (Case No. 17-14291 (ELF)), Calnshire Estates, LLC (Case No. 17-14457 (ELF)) and Steeple Run LP (Case No. 17-14458) to cases under Chapter 7 of the Bankruptcy Code or, in the alternative, to appoint Chapter 11 Trustees [Island View Docket No. 34], and (ii) the Motion of Island View Crossing II, L.P. for authority to Obtain Post-Petition Financing Pursuant to Sections 364 and 363 of the Bankruptcy Code [Island View Docket No. 55].

176:12-20	<p>Q: Okay. Have you from time to time asked the bank to give you a reference letter?</p> <p>A: Yes.</p> <p>Q: What were the purposes of those reference letters?</p> <p>A: Some could have been for land acquisition, multiple reasons.</p> <p>Q: Could there also have been letters that were being given so that you could go find substitute financing?</p> <p>A: Absolutely.</p>
178:6-16	<p>Q: How long have the Steeple lots been in your inventory?</p> <p>A: Since about 2000 or so.</p> <p>Q: 2000?</p> <p>A: Somewhere around there.</p> <p>Q: Why didn't you consider selling them in order to get out from under any of the obligations that are connected to them?</p> <p>A: There was multiple reasons. We had to reaffirm the approvals in order to get a good price. Then there was a sewer moratorium in Richland Township for a few years. Then, eventually, the market crashed.</p>
178:17-25	<p>Q: How about since then?</p> <p>A: Since 2008?</p> <p>Q: Yes. You've been keeping it in your inventory for almost ten years, right?</p> <p>A: What happened in 2008 why do you think we didn't build it since then?</p> <p>Q: Because you didn't have any money to do it.</p> <p>A: No, because Island View is going to generate -- Island View came along and that will generate multiple times profit...</p>
179:1-10	<p>... potential and that was where all the cash is. So, rather than going to Steeple Run we went to Island View. The numbers are -- you can't even compare them.</p> <p>Q: When did you obtain Island View?</p> <p>A: 2011.</p> <p>Q: So, between 2008 and 2011 you didn't even have Island View on your radar screen at all, right?</p> <p>A: So, we just went through this First Horizon and you're asking me why we didn't start Steeple Run. Okay. So there --</p>
179:16-22	<p>THE COURT: I will let him answer the question. You actually just repeated your question. He didn't answer it. You want to answer the question go ahead.</p> <p>THE WITNESS: There was no financing, the market was in freefall and did I say there was no financing and the market was in freefall. Why would you put more inventory in production?</p>
198:18-25	<p>Q: You said you're not aware of whether there was a written contract between Americorp and IVC with respect to the removal of the concrete, right?</p> <p>A: I'm not sure.</p> <p>Q: And do you recollect whether there was any agreement between Americorp that would be responsible for the site conditions as they existed at the time they started the work as opposed to what they discovered in the process?</p>
199:1-14	<p>A: I'm not sure if I understand your question.</p>

	<p>Q: Well, in a typical contract relationship where you're hiring a subcontractor wouldn't you ask the subcontractor to come out and look at the conditions, and give you a quote, and expect them to stick with that quote?</p> <p>A: Yes.</p> <p>Q: But Americorp came out and looked at it, and there was something unexpected, and the cost went up, right?</p> <p>A: You can't get a quote when you're talking about 7,000 cubic yards. You don't know what it's going to be 25 feet underground let alone how much steel is in it.</p> <p>Q: Well, isn't that the point of getting a contract service --</p> <p>A: No, here's how they do it --</p>
199:15-25	<p>Q: Excuse me. Isn't that the point of getting a contract like that so that the owner of the property is not assuming the risk that a contractor underbids it only to be unable to perform at the contract quote?</p> <p>A: You're not asking for somebody to put up a building, which is little to no moving parts. You're asking for subsurface concrete removal that was placed over a hundred years ago with steel I beams every 24 feet. Nobody knows the magnitude. You would have had a contractor there at time and material and that's an open checkbook. That is where they make money; take my word for it.</p>
203:5-25	<p>Q: Okay. How did you arrive at the number of \$480,000 dollars for the subsurface concrete removal? Who gave that estimate?</p> <p>A: I did.</p> <p>Q: And what was that estimate based on?</p> <p>A: I did it three or four years ago. It was a quantity range that based on the engineering we had at the time it was going to be somewhere between a half a million and a million dollars was the best guess because we're not talking about how much road are we paving that you can quantity. Wearing course, for example.</p> <p>Q: I'm talking about subsurface concrete removal.</p> <p>A: I understand.</p> <p>Q: So, you thought it could be between \$480 and a million dollars?</p> <p>A: I guesstimated between that and a million, and I went with the lower because of our maximum loan. So, I went with the lower of what I thought it could be.</p> <p>Q: Okay. So you thought that it might be a million dollars, but because you knew that there was a lending limit you reduced the amount of the request to 480?</p>
204:1-14	<p>A: I went with the lower range. We weren't sure, not to mention I really didn't have a choice.</p> <p>Q: But your testimony is that you didn't put the higher number in because you knew that there was a lending limit, right?</p> <p>A: I was -- yes, we were trying to keep the loan down. Yes. We were trying to make it all work, yes.</p> <p>Q: All right. So, you shorted yourself by doing that, didn't you?</p> <p>A: I shorted myself because there's a lending limit.</p>

	<p>Q: You shorted yourself because you took a loan that wasn't sufficient for you to complete the construction at a number that you thought might be possible, didn't you?</p> <p>A: That's not true.</p>
204:15-25	<p>Q: Okay. Well, it turned out that 480,000, as your testimony points out, was very low.</p> <p>A: 450. I know it's hard to read.</p> <p>Q: Okay. Isn't that true?</p> <p>A: It's a very conservative estimate.</p> <p>Q: And that had a deleterious effect on the development in the sense that it delayed the production of the units, right?</p> <p>A: So, we went, and assumed the risk and took care of this problem; now we're the bad guy.</p> <p>THE COURT: You know what you're doing, you're skipping the answer to his question and then you're providing...</p>
205:1-5	<p>... some justification or explanation. It's a natural tendency, three out of four witnesses do it. You really have to try to curb that. Just answer his questions.</p> <p>THE WITNESS: I will do much better. I'm sorry. So, we went with the lower range, yes.</p>

Exhibit “H”

Exhibit “H”

# **EXHIBIT “H”**

**Designation of Partial Transcript of Hearing Testimony of Renato Gualtieri**  
**Held on November 17, 2017<sup>1</sup>**

<b>Page</b>	<b>Description</b>
10:8-25	Q: So now you mention PECO and something that’s called, I think it was called an E-bar. A: E-bar. Q: E-bar? A: Yes. Q: And so you said that you have to go through this E-bar process so that you can get on PECO’s construction schedule? A: No, no. E-bar is I guess for simplicity, it’s PECO’s way or formula that they have to determine whether a deposit is required for them to bring gas to your site and on your site based on, they call it offsite approach means and how many units and they try to generate a revenue stream. That’s all been done, the numbers determine that’s the number. And all that is is a component of our existing agreement with PECO to service Island View with gas and electric. And in this case the 108,000 is only for gas; electric they have to base on the PUC. Q: But I thought yesterday you testified that you have to ...
11:1-6	... do the trenching and then you have to get PECO’s construction schedule to get the development energized. Do you remember saying that? A: Yes. Q: And do you have any control over PECO’s construction schedule?
11:13-18	THE WITNESS: You have to estimate when you need them and they have a lag time and it varies and you coordinate it with your trencher. BY MR. GEORGE: Q: But it could be several months lag time, couldn’t it? A: It could.
12:2-4	Q: But you couldn’t sell or close any units until you have them fully energized with the dedicated line. Right? A: Yes, that’s correct.
32:15-25	THE COURT: At what point was the ownership interest in Americorp Construction Inc. transferred to Nancy Maychuk? When did that happen?

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<sup>1</sup> The testimony designated herein is from the consolidated November 17, 2017 hearing on (i) the Motion of Prudential Saving Bank to Convert the Chapter 11 case of Island View Crossing II, L.P. (Case No. 17-14454 (ELF)) and related cases One State Street Associates, L.P. (Case No. 17-14291 (ELF)), Calnshire Estates, LLC (Case No. 17-14457 (ELF)) and Steeple Run LP (Case No. 17-14458) to cases under Chapter 7 of the Bankruptcy Code or, in the alternative, to appoint Chapter 11 Trustees [Island View Docket No. 34], and (ii) the Motion of Island View Crossing II, L.P. for authority to Obtain Post-Petition Financing Pursuant to Sections 364 and 363 of the Bankruptcy Code [Island View Docket No. 55].



	<p>THE WITNESS: It was sold to her in May I think of, it was definitely in 2014. May of 2014.</p> <p>THE COURT: What was the reason for that?</p> <p>THE WITNESS: We were trying to raise cash. She had retirement funds and --</p> <p>THE COURT: So she put some money in --</p> <p>THE WITNESS: She put about a half a million dollars into it.</p>
33:1-10	<p>THE COURT: And did she do it in the form of putting it directly into Americorp Construction or did she put it into other entities of yours and --</p> <p>THE WITNESS: It was quite a few different things. I sold the property to her and then she refinanced that property and then bought the construction company. And a lot of it again had to do with those cash interest reserves that we did with Prudential with guidance through Prudential in order to generate liquidity to try to get Island View started knowing that this thing has an incredible proforma.</p>
39:12-22	<p>THE COURT: So it was a permit delay basically. Is that what you're saying?</p> <p>THE WITNESS: Well, the permit delay, but also during that process, they added an extra step where we had to remediate about a dozen hotspots. It was page 21, the soil management plan that we had to adhere to to comply with their more stringent residential minimum standards. And so as soon as we got the permit and ripped up the parking lot, prior to the earth work and prior to that hammering that we just talked about, we and Penny and Arc (phonetic) went and remediated that and that was another --</p>